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JTW: USAO #2024R00041

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

USDC- BALTIMORE
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UNITED STATES OF AMERICA

v.

ROBERT BOWMAN,

Defendant.

* CRIMINAL NO. *BAH 24cr53*
*
* (Conspiracy to Distribute and
* Possession with the Intent to Distribute
* Controlled Substance, 21 U.S.C. § 846;
* Forfeiture, 21 U.S.C. § 853)
*

CRIMINAL INFORMATION
(Conspiracy to Distribute and Possession with the Intent to Distribute Cocaine)

The United States Attorney charges that:

From in or about January 2019 until on or about February 24, 2023, in the Middle District of Pennsylvania, the District of Maryland, and elsewhere the defendant,

ROBERT BOWMAN,

did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to distribute and possess with the intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 846

FORFEITURE ALLEGATIONS

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853 in the event of the Defendant's conviction under this Criminal Information.

Narcotics Forfeiture

2. Upon conviction of the offense alleged in this Criminal Information, the Defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense.

Property Subject to Forfeiture

3. The property to be forfeited includes, but is not limited to: approximately \$21,158 in U.S. currency seized during the execution of a search and seizure warrant on or about February 24, 2023.

Substitute Assets

4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above, pursuant to 21 U.S.C. § 853(p).

21 U.S.C. § 853

Erek L. Barron 
Erek L. Barron
United States Attorney

Digitally signed by
JAMES WALLNER
Date: 2024.02.22
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